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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MEGAN SCHMITT, DEANA
REILLY, CAROL ORLOWSKY, and
STEPHANIE MILLER BRUN,
individually and on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

YOUNIQUE, LLC,
Defendant.

Case No. 8:17-cv-01397-JVS-JDE

**DECLARATION OF BONNER C.
WALSH IN SUPPORT OF CLASS
CERTIFICATION AND
APPOINTMENT OF COUNSEL**

Complaint Filed: 8/17/17

Trial Date: 2/19/19

1 I, Bonner C. Walsh, declare as follows:

2 1. I am a member of the law firm of Walsh PLLC. I submit this
3 declaration in support of Plaintiffs' motion for class certification and appointment
4 of class counsel. I have personal knowledge of the matters set forth herein based
5 upon my active supervision and participation in all material aspects of the
6 litigation.

7 2. My firm has acted as one of the co-lead counsel in this matter. My
8 firm has extensive class action experience. The firm represents individuals,
9 debtors, and small businesses in class action cases litigated throughout the United
10 States. My firm has served as sole lead-counsel, as co-lead counsel, or on an
11 executive committee in numerous class actions, including many cases brought on
12 behalf of consumers.

13 3. The instant matter required a working knowledge of basic chemistry.
14 Due to my background, I was well positioned to assist all counsel in this matter on
15 the scientific aspects of this case. It is important for class counsel to have an
16 attorney with a technical background and the ability to understand scientific issues
17 in any case that has a scientific aspect. I am filling that role in the instant matter.

18 4. With respect to the standing of counsel in this case, and my experience
19 in class action matters, the following information is relevant to this case:

20 5. I have a Bachelor of Sciences in Physics from the Washington State
21 University. Additionally, I did another year of further graduate studies in Physics
22 prior to going to law school. These studies included chemistry coursework giving
23 me needed background for this matter. My experience allowed class counsel to
24 understand which of Defendant's claims were questionable or impossible from a
25 scientific perspective.

26 6. Prior to law school, I did significant research concerning defects in
27 metals and gained familiarity with laboratory testing protocols. This has enabled
28

me to liaison with non-testifying experts in this litigation and to streamline many aspects regarding scientific concepts and how they apply to the litigation at hand.

7. My research has been published in *Hyperfine Interactions*, an international journal devoted to research in solid state physics, atomic physics, nuclear physics and relevant chemistry. *See* Matthew O. Zacate, Bonner C. Walsh, et al., *Segregation of Solutes In Two-Phase Mixtures*, Vol. 136:3, *Hyperfine Interactions*, 653-658 (2002).

8. I also presented my research, *Site Preferences of Solutes in the Two-phase Field Between Pd₃Ga₇ And PdGa*, to the American Physics Society in March 2001.

9. I have acquired substantial experience in class actions and other complex litigation, and have obtained favorable settlements as class counsel.

10. My firm or my previous firm have been certified as class counsel in at least seven consumer class actions since 2010, including:

- *Eatmon v. Palisades Collection LLC*, No. 2:08-cv-00306 (E.D. Tex. Mar. 24, 2010) (Order adopting report and recommendations to certify class and appoint class counsel);
- *Lantrip v. Dodeka L.L.C.*, No. 2:08-cv-00476 (E.D. Tex. Sept. 15, 2011) (Order granting final approval of settlement and appointing class counsel);
- *Taylor v. Apex Financial Management*, No. 2:09-cv-00229-TJW (E.D. Tex. Sept. 21, 2010) (Order Granting Class Certification and appointing class counsel);
- *Walker v. Asset Acquisition Group, L.L.C.*, No. 9:10-cv-185 (E.D. Tex. Aug. 25, 2011) (Order Granting Class Certification and appointing class counsel);
- *Bobby Prescott and Pamela White v. Autovest, L.L. C.*, 2:11-cv-00219, (E.D. Tex. October 28, 2011) (Order Conditionally Certifying Class, Granting Approval and appointing class counsel);

- *Michael Cox, et al v. Hilco Receivables, LLC and Central Credit Services, Inc.*, 3:09-cv-0897, (N.D. Tex. Sept. 16, 2011) (Order Granting Preliminary Approval and appointing class counsel).

11. More recently, I was an active Executive Committee member in *In Re: Shop-Vac Marketing and Sales Practices Litigation*, MDL 2380 (M.D. Pennsylvania, December 9, 2016) (Memorandum by Judge Kane in support of Final Approval) and I was co-Lead counsel in *Foster, et. al v. L-3 Communications EOTech, Inc. et. al* (W.D. MO July 7, 2017) (Order Granting Final Approval). Additionally, I was co-lead counsel in *Park, et. al v. Zuffa, LLC et. al.* (D. NV July 20, 2018) (Order Granting Final Approval) and currently serve as the executive committee in *In re: Hyundai and Kia Engine Litigation* (C.D. CA June 15, 2018)(Order appointing Interim Class Counsel and Executive committee).

12. The above actions resulted in over \$500,000,000.00 in total benefits to those classes of consumers/debtors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 1st day of August 2018.

/s/ Bonner C. Walsh

Bonner C. Walsh

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